

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
Nashville, Tennessee

In re: :

LEN SALAS : Case No. 18-2662-MJH

Debtor :

NICOLAAS BREKELMANS AND GAIL :
GREGORY BREKELMANS,
CO-PERSONAL REPRESENTATIVES :
OF THE ESTATE OF NINA
BREKELMANS, et al :

Plaintiffs-Appellants :

v. : Adversary Proceeding No. 3:20-ap-90027

MAX SALAS :

Defendant-Appellee :

PLAINTIFFS'-APPELLANTS' NOTICE OF APPEAL

The Plaintiffs' note their appeal of this Court's Order granting and denying the parties' cross-motions for summary judgment and denying the Plaintiffs' Motion to Reconsider and in support of their Notice, submit the following in accordance with the Rules of this Court including the Appellate Rules contained in Fed. R. Bankr. P. 8001, *et seq.*:

1. Names of Appellants:

- a. Plaintiffs, Nicolaas Brekelmans and Gail Gregory Brekelmans, Co-personal Representatives of the Estate of Nina Brekelmans; and
- b. Plaintiffs, Michael McLaughlin and Martha Johnson, Co-personal Representatives of the Estate of Michael Patrick McLoughlin.

2. The Subject of the Appeal

a. ORDER dated May, 24, 2023 (D-102) denying the Plaintiffs' Motion for Summary Judgment and partially granting the Defendant's Motion for Summary Judgment; and

b. ORDER dated August 16, 2023 denying the Plaintiffs Motion to Alter or Amend the Court's Order of May 24, 2023 (D-109).

3. Other Parties to the Appeal

Max D. Salas, represented by

Phillip G. Young, Jr.
Thompson Burton PLLC
One Franklin Park
6100 Tower Circle, Suite 200
Franklin, TN 37067
615-465-6000
615-807-3048 (fax)
Phillip@thompsonburton.com

Respectfully submitted,

BURCH PORTER & JOHNSON, PLLC

By: /s/ Taylor A. Cates
Taylor A. Cates
130 North Court Avenue
Memphis, TN 38103
901-524-5165
901-524-5000 (fax)
Tacates@bpjlaw.com

LAW OFFICE OF PHILIP J. McNUTT, PLLC

By: /s/ Philip J. McNutt
Philip J. McNutt
11921 Freedom Drive, Ste 588
Reston, VA 20190
703-904-4380
202-379-9217 (fax)

Pmcnutt@mcnuttlawllc.com

Certificate of Service

I HEREBY CERTIFY that a copy of the foregoing Notice of Appeal was delivered electronically through the Court's ecf noticing system to the United States Trustee, Phillip G. Young, Jr., attorney for the Defendant-Appellee, and all parties requesting notice, all on this 28th day of August, 2023.

/s/ Philip J. McNutt
Philip J. McNutt